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and

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Attorneys for Defendants

**IN THE UNITED STATES DISTRICT COURT
 FOR THE DISTRICT OF WYOMING**

STEPHANIE WADSWORTH)
 Individually and as Parent and Legal Guardian)
 of W.W., K.W., G.W., and L.W., minor children)
 and MATTHEW WADSWORTH,)

Plaintiffs,)

v.)

WALMART INC. and)
 JETSON ELECTRIC BIKES, LLC,)

Defendants.)

Case No. 2:23-cv-00118-NDF

**DECLARATION OF
 EUGENE M. LAFLAMME**

JURY TRIAL DEMANDED

STATE OF WISCONSIN)
) SS
COUNTY OF WAUKESHA)

I, Eugene M. LaFlamme, state as follows:

1. I am an attorney at McCoy Leavitt Laskey LLC located in Waukesha, Wisconsin.
2. I am one of the attorneys of record for Defendants, Jetson Electric Bikes, LLC and Walmart Inc., admitted *pro hac vice* on August 24, 2023.
3. I attended the depositions of Plaintiffs' experts, Dr. Ronald Snyder, Derek King, and Michael Schultz, taken on August 14, 2024, August 19, 2024, and September 10, 2024, respectively.
4. To date, only the defense has sent notices and/or subpoenas for depositions of Plaintiffs' medical care providers and treaters.
5. At no time since this case was filed on July 6, 2023 have Plaintiffs noticed and/or subpoenaed their own medical care providers and treaters for deposition.
6. Attached as Exhibit 1 are the pertinent portions of Plaintiffs' expert, Dr. Ronald Snyder's deposition.
7. Attached as Exhibit 2 is a true and correct copy of the email from Attorney Rudwin Ayala dated September 3, 2024 and time stamped 12:21 p.m. CDT.
8. Attached as Exhibit 3 is a true and correct copy of the electronic filing notice of Plaintiffs' Motion to Amend Expert Disclosures, filed by Attorney Rudwin Ayala, dated September 3, 2024 and time stamped 2:31 p.m. CDT.
9. Attached as Exhibit 4 is a true and correct copy of the email from Paralegal Samanda Leroy dated September 3, 2024 and time stamped 3:43 p.m. CDT which attached Plaintiffs' Motion to Amend Expert Disclosures.

Dated: September 17, 2024



Eugene M. LaFlamme

Subscribed and sworn to before me this
17th day of September, 2024.



Notary Public, State of Wisconsin

My Commission expires: 5-18-26